

State Water Resources Control Board

May 10, 2018

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7017 2680 0000 6195 8855

Mr. Mike Logan
Purchasing Agent
Mammoth Lakes Community
Water District
1315 Meridian Boulevard
Mammoth Lakes, California 93546
mlogan@mcwd.dst.ca.us

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS AT
1315 MERIDIAN BOULEVARD, MAMMOTH COMMUNITY WATER DISTRICT,
MAMMOTH LAKES**

Dear Mr. Logan:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on April 26, 2018, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Monitor Product Piping – The sensor in the under dispenser containment (UDC) was raised; Also, shop rags and other debris were preventing its ability to detect a leak at the earliest opportunity.	Diesel	April 26, 2018	Ongoing	23 CCR 2630(d)
2	Failure to Monitor Product Piping – The sensor in the turbine sump was incorrectly positioned at an angle preventing a leak from being detected at the earliest opportunity.	Diesel	April 26, 2018	Ongoing	23 CCR 2630(d)

No.	Violation	Tank	Start Date	Stop Date	Regulation
3	Failure to Monitor Product Piping – The test boot for the boiler system product line was found to be on and the Schrader valve was pointing upwards preventing a leak from being detected at the earliest opportunity.	Diesel	April 26, 2018	Ongoing	23 CCR 2630(d)
4	Failure to Monitor Product Piping – The sensor in the turbine sump was raised preventing a leak from being detected at the earliest opportunity.	Regular Unleaded	April 26, 2018	Ongoing	23 CCR 2630(d)
5	Failure to Tag Monitoring Equipment – The monitoring panel was missing the annual monitoring certification tag for the most recent system certification performed on July 20, 2017.	All	April 26, 2018	Ongoing	23 CCR 2638(f)
6	Failure to Maintain Tank Information – In CERS, the diesel tank system only lists it is used for motor vehicle fuel; However, it also provides fuel to the boiler systems. CERS must be updated to include the boiler system.	Diesel	April 26, 2018	Ongoing	23 CCR 2711(a)
7	Failure to Maintain Tank Information – In CERS, tank information lists that striker plate/bottom protectors are not installed. Verify all tank systems have striker plate/bottom protectors and update the information in CERS.	All	April 26, 2018	Ongoing	23 CCR 2711(a)
8	Failure to Maintain Tank Information – In CERS, the diesel tank is listed as having a 10,000-gallon capacity and the regular unleaded tank as having a 5,000-gallon capacity. This does not match the information listed on the system setup tapes.	All	April 26, 2018	Ongoing	23 CCR 2711(a)
9	Failure to Maintain Tank Information – In CERS, the tank information must be updated with the UDC sensor manufacturer and model number.	All	April 26, 2018	Ongoing	23 CCR 2711(a)

No.	Violation	Tank	Start Date	Stop Date	Regulation
10	Failure to Maintain Site Map – An approved site map indicating the location of the boiler system product supply and return lines, diesel and unleaded product piping, tanks, and auxiliary equipment with respect to buildings or other landmarks was not available in CERS or onsite at the time of the inspection.	All	April 26, 2018	Ongoing	H&SC 25286(a); 23 CCR 2711(a)(8)
11	Failure to Maintain Operating Permit – The permit observed at the time of inspection had an expiration date of June 30, 2012.	All	July 1, 2012	Ongoing	H&SC 25284(a)
12	Failure to Maintain or Update Financial Responsibility – The financial responsibility documents onsite and in CERS expired on July 1, 2016.	All	April 26, 2018	Ongoing	H&SC 25292.2; CCR 2711(a)(11)
13	Failure to Provide Valid Board of Equalization Number – The BOE number listed in CERS is invalid.	All	April 26, 2018	Ongoing	H&SC 25286(c)(9)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and Mono County Department Health and Human Services within sixty (60) days from the date of this letter. Have your Designated Operator make specific notations in the next monthly designated operator report indicating the ongoing violations have been corrected. The monthly designated operator report and any associated photos must be submitted as proof of compliance. Please have the minor amounts of liquid in the diesel and regular unleaded tanks systems turbine and fill sumps removed.

Please send all compliance documentation to the following:

State Water Board

Mr. Will Speth
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
will.speth@waterboards.ca.gov

Local CUPA

Mr. Luis Molina, Director
Mono County Health and
Human Services
P.O. Box 3329
Mammoth Lakes, California 93546
lmolina@mono.ca.gov

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: *(via email only)*

Mr. Luis Molina, Director
Mono County Health Department
lmolina@mono.ca.gov

Ms. Jill Kearney, REHS
Environmental Health Specialist
Mono County Health Department
jkearney@mono.ca.gov

Ms. Chris Weibert
Human Resources Manager
Mammoth Community Water District
cweibert@mcwd.dst.ca.us